

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Mason Eugene Breiner-Myers  
a/k/a Mason Eugene Breiner  
a/k/a Mason Eugene Myers

**Debtor 1**

Freedom Mortgage Corporation  
**Movant(s)**

v.

Mason Eugene Breiner-Myers  
a/k/a Mason Eugene Breiner  
a/k/a Mason Eugene Myers

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:20-BK-02760-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 51

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Mason Eugene Breiner-Myers, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part, denied in part. It is admitted that Movant(s) instituted foreclosure proceedings on the Mortgage due to Debtor(s)' failure to make payment required. Debtor(s) are without sufficient knowledge as to whether tendering monthly payments results in a lack of adequate protection; therefore, it is denied.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Admitted in part, denied in part. It is admitted that, at the time of the filing, Debtor(s)' next payment was due on or before December 1, 2021 in the amount of \$1,321.32. Debtor(s) are without sufficient knowledge as whether or not his lack of continuing obligation results in a lack of adequate protection to Movant(s); therefore, it is denied.

8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 8; therefore, it is denied.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Paragraph 10 contains a conclusion of law to which no response is required.

11. Paragraph 11 contains a conclusion of law to which no response is required.

12. Paragraph 12 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: December 9, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
(717) 975-9446  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, December 9, 2021, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Mario Hanyon, Esquire  
BROCK & SCOTT, PLLC  
302 Fellowship Road, Suite 130  
Mount Laurel, NJ 08054  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire